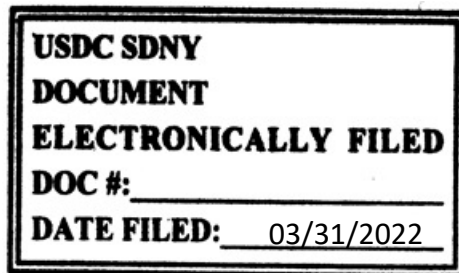


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March 25, 2022

VIA ECF

Honorable Lorna G. Schofield
United States District Court Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

Allianz Global Investors GmbH, et al., v. Bank of America Corporation, et al., 1:18-cv-10364

Dear Judge Schofield:

Pursuant to Rules I.B.1 and I.D of Your Honor's Individual Rules and Procedures for Civil Cases, we respectfully seek leave to file under seal certain supporting papers and exhibits to Plaintiffs' Motion for Issuance of a Hague Convention Request for International Judicial Assistance to Take Testimony Overseas. Pursuant to Rule I.D.3, this motion and supporting papers have been publicly filed with the redactions, and unredacted versions have been electronically filed under seal and linked to this application.

This request asks the Court to seal the Third Amended Complaint (already filed under seal), documents that reference numerous chat transcripts that Defendants produced and designated as confidential, copies of the chat transcripts, and personal information about the proposed deponent. Given Defendants designated these materials as "confidential," supporting papers include documents already filed under seal, and sensitive personal information of the deponent is contained within these papers, Plaintiffs respectfully request that the Court grant Plaintiffs permission to file the requested documents in redacted form on ECF and in unredacted form under seal.

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Respectfully submitted,

/s/ Daniel L. Brockett

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03531-00008CT/13257909 1

Request GRANTED. The proposed redactions and sealing requests are narrowly tailored to prevent unauthorized dissemination of sensitive business information. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 11920 (2d Cir. 2006). SO ORDERED.

Dated: March 31, 2022

